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December 22, 2022

Hon. Edgardo Ramos
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

**Re: Najera et al v. Atmi Junior Laundromat Inc. et al;
21 cv 01309-ER**

Dear Judge Ramos:

The parties in the above referenced action were directed to file a Joint Pre-Trial Statement and exhibits and witness affidavits by December 23, 2022. I am a solo practitioner and I have been overwhelmed by the number of pre-trial hearings, motions and other litigation matters over the past month before the Christmas break. Further, my ability to meet with my client and the multiple witnesses that will be testifying at this trial has been very difficult due to the holiday schedule and the time constraints due to my litigation obligations.

I am most respectfully requesting an extension to file the Joint Pre-trial statement to January 15, 2023.

I apologize for any inconvenience to the Court. Please advise if this is acceptable.

Respectfully,

Edward J. Muccini Esq.

Defendants' request for an initial extension of time to file the pre-trial statement, exhibits, and affidavits (until January 15, 2023) is granted. Both parties shall submit their filings by that date.
SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: December 23, 2022
New York, New York